



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 15 2014

CERTIFIED MAIL 7009 1680 0000 7677 8336
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Ms. Daisy Childs
Environmental, Health and Safety Senior Manager
American Showa, Inc.
Sunbury Plant
707 West Cherry Street
Sunbury, Ohio 43074-9595

Re: Notice of Violation
American Showa, Inc., Sunbury, Ohio
OHD 178 297 297

Dear Ms. Childs:

On May 20, 2014 representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the American Showa, Inc. (American Showa) facility located in Sunbury, Ohio. The purpose of the inspection was to evaluate American Showa's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation of hazardous waste. We have enclosed a copy of the RCRA inspection report for your reference. In addition, EPA acknowledges receiving several e-mails from American Showa since the May 20, 2014 inspection.

Based on information provided by American Showa personnel, review of records and physical observations by the inspectors, EPA finds that American Showa violated certain requirements of the Ohio Administrative Code (OAC) the United States Code of Federal Regulations (CFR). We find that American Showa was not in compliance with the storage permit exemption and in violation of the following generator requirements:

- 1) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77, 3745-66-72, and the generator complies with the requirements for owners or operators in paragraph (A)(5) of OAC Rule 3745-270-07 and OAC 3745-65-16, 3745-65-30 to 3745-65-37, and 3745-65-50 to 3745-65-56 of the OAC. See, OAC Rule 3745-52-34(A)(1)(a) and (A)(4) [40 CFR § 262.34(a)(1) and (a)(4)]. A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph E of rule 3745-51-33 of the Administrative Code in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and

without complying with paragraph A of this rule provided he: (a) Complies with rules 3745-66-71, 3745-66-72, and paragraph A of rule 3745-66-73 of the Administrative Code; and (b) Marks his containers with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, OAC Rule 3745-52-34(C)(1)(a) and (b) [40 CFR § 262.34(c)(1)]. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. See, OAC Rule 3745-66-73(A) [40 CFR § 265.173(a)].

During the inspection of the Wastewater Treatment Area, the inspectors observed two 10-gallon containers of waste paint pens and waste paint markers that were not labeled "Hazardous Waste", see photograph number 5. In addition, during the inspection of the Wastewater Treatment Plant, the inspectors observed an aerosol can puncturing device on a 55-gallon container. The container was not labeled "Hazardous Waste" and was open, see photograph number 6. Also, during the inspection of the chromium plating line, the inspectors observed a 55-gallon SAA container and 5-gallon SAA container, which were not labeled "Hazardous Waste", see photograph number 15 and 16. At the time of the inspection, American Showa was in violation of OAC Rule 3745-52-34(C)(1)(a) and (b) [40 CFR § 262.34(c)(1)] and OAC Rule 3745-66-73(A) [40 CFR § 265.173(a)].

- 2) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77, 3745-66-72, and the generator complies with the requirements for owners or operators in paragraph (A)(5) of OAC Rule 3745-270-07 and OAC 3745-65-16, 3745-65-30 to 3745-65-37, and 3745-65-50 to 3745-65-56 of the OAC. See, OAC Rule 3745-52-34(A)(1)(a) and (A)(4) [40 CFR § 262.34(a)(1) and (a)(4)]. In addition, the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container and while being accumulated and/or treated on-site. See, OAC Rule 3745-52-34(A)(2) [40 CFR § 262.34(a)(2)]. In addition, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. See, OAC Rule 3745-66-73(A) [40 CFR § 265.173(a)].

During the inspection of the Wastewater Treatment Area, the inspectors observed a 1-cubic yard container of F006 electroplating filter cake sludge that did not have an accumulation date and was not covered, see photographs number 3 and 4. At the time of the inspection, American Showa was in violation of OAC Rule 3745-52-34(A)(2) [40 CFR § 262.34(a)(2)] and OAC Rule 3745-66-73(A) [40 CFR § 265.173(a)].

- 3) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77, 3745-66-72, and the generator complies with the requirements for owners or operators in paragraph (A)(5) of OAC Rule 3745-270-07 and OAC 3745-65-16, 3745-65-30 to 3745-65-37, and 3745-65-50 to 3745-65-56 of the OAC. See, OAC Rule 3745-52-34(A)(1)(a) and (A)(4) [40 CFR § 262.34(a)(1) and (a)(4)]. Specifically, the owner or operator must maintain aisle space to allow the unobstructed movement of

personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes. See, OAC Rule 3745-65-35 [40 CFR § 265.35].

During the inspection of the hazardous waste accumulation area, the inspectors observed 55-gallon and 1-cubic yard hazardous waste containers that were accessible on one side only, see photograph number 9. At the time of the inspection, American Showa was in violation of OAC Rule 3745-65-35 [40 CFR § 265.35].

- 4) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77, and the generator complies with the requirements for owners or operators in paragraph (A)(5) of OAC Rule 3745-270-07 and OAC 3745-65-16, 3745-65-30 to 3745-65-37, and 3745-65-50 to 3745-65-56 of the OAC. See, OAC Rule 3745-52-34(A)(1)(a) and (A)(4) [40 CFR § 262.34(a)(1) and (a)(4)] . Specifically, facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of the hazardous waste facility interim standards chapters. See, OAC Rule 3745-65-16(A)(1) [40 CFR § 265.16(a)(1)]. The training program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to the positions in which they are employed. See, OAC Rule 3745-65-16(A)(3) [40 CFR 265.16(a)(2)]. Facility personnel must take part in an annual review of the initial training required in paragraph (A) of this rule. See, OAC Rule 3745-65-16(C) [40 CFR § 265.16(c)].

During the records review portion of the inspection, the inspectors reviewed personnel training records. American Showa employees did receive hazardous waste training but it did not include contingency plan implementation information. In addition, no personnel had received training in 2013. Therefore, American Showa was in violation of OAC Rule 3745-65-16(A)(3) [40 CFR § 265.16(a)(2)] and OAC Rule 3745-65-16(C) [40 CFR § 265.16(c)].

- 5) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77, and the generator complies with the requirements for owners or operators in paragraph (A)(5) of OAC Rule 3745-270-07 and OAC 3745-65-16, 3745-65-30 to 3745-65-37, and 3745-65-50 to 3745-65-56 of the OAC. See, OAC Rule 3745-52-34(A)(1)(a) and (A)(4) [40 CFR § 262.34(a)(1) and (a)(4)] . Specifically, the owner or operator shall inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors and the owner or operator shall record the inspections in an inspection log or summary. See, OAC Rule 3745-66-74(A) and (B) [40 CFR § 262.34(a)(1)(i) and 40 CFR § 265.174].

During the records review portion of the inspection, the inspectors reviewed the weekly inspection logs. A weekly inspection had not been recorded for the week of 5/2/2014 and week of 5/16/2014. Therefore, American Showa was in violation of OAC Rule 3745-66-74(A) and (B) [40 CFR § 262.34(a)(1)(i) and 40 CFR § 265.174].

- 6) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77, and the generator complies with the requirements for owners or operators in paragraph (A)(5) of OAC Rule 3745-270-07 and OAC 3745-65-16, 3745-65-30 to 3745-65-37, and 3745-65-50 to 3745-65-56 of the OAC. See, OAC Rule 3745-52-34(A)(1)(a) and (A)(4) [40 CFR § 262.34(a)(1) and (a)(4)]. Specifically, a copy of the contingency plan and all revisions to the plan must be maintained at the facility and submitted to all local police departments, fire departments, hospitals and the Ohio EPA and local emergency response teams, that may be requested to provide emergency services. See, OAC Rule 3745-65-53(A) and (B) [40 CFR 265.53(a) and (b)].

During the records review portion of the inspection, the inspectors reviewed an 8/13/2013 version of the contingency plan. However, American Showa personnel told the inspectors that copies of the plan had not been distributed. Therefore, American Showa was in violation of OAC Rule 3745-65-53(B) [40 CFR § 265.53(b)].

- 7) A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. Specifically, a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. See, OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)]. In addition, each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or Used Lamp(s)." See, OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)].

During the inspection of the Two Wheel Electric Room universal lamp accumulation area, inspectors observed one container of used fluorescent lamps that was open, see photograph number 17. Therefore, American Showa was in violation of OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)].

- 8) Except as provided in paragraphs (A)(1) to (A)(4) of OAC Rule 3745-279-20, Rules 3745-279-20 to 3745-279-24 of the OAC apply to all used oil generators. See, OAC Rule 3745-279-20(A). Used oil generators are subject to all applicable spill prevention, control and countermeasures (40 CFR Part 112) in addition to the requirements of Rules 3745-279-20 to 3745-279-24 of the OAC. See, OAC Rule 3745-279-22. Specifically, containers and aboveground tanks used to store used oil at generator facilities shall be

labeled or marked clearly with the words "Used Oil." See, OAC Rule 3745-279-22(C) [40 CFR § 279.22(c)(1)].

During the inspection of the Assembly Line and Bulge Line, the inspectors observed several unlabeled 5-gallon containers of used oil, see photographs number 1 and 2. Therefore, American Showa was in violation of OAC Rule 3745-279-22(C) [40 CFR § 279.22(c)(1)].

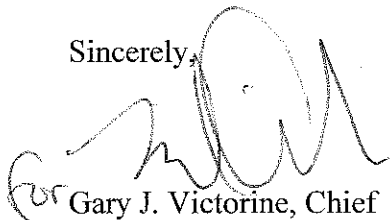
Area of Concern

During the inspection of the Chemical and Hazardous Waste Accumulation Area, the inspectors observed eight 55-gallon containers of "ChemFos", see photograph number 8. American Showa personnel told the inspectors that a determination had been made to discard the material. During the records review portion of the inspection, the inspectors reviewed an MSDS for the ChemFos material which indicated a pH of 1.5. Please note that when American Showa makes a determination to discard a material that has a hazardous waste characteristic, that you have 90 days or less to ship that material off-site.

At this time, EPA is not requiring American Showa to apply for a storage license so long as American Showa immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

cc: Grant Hewett, Ohio EPA-Central District Office
(grant.hewett@epa.ohio.gov)
Bruce McCoy, Ohio EPA – Columbus Office
(bruce.mccoy@epa.ohio.gov)

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: AMERICAN SHOWA, INC.

FACILITY U.S. EPA ID NO.: OHD 178 297 297

FACILITY TYPE: Large Quantity Generator

FACILITY ADDRESS: 707 W. Cherry Street
Sunbury, Ohio 43074

U.S. EPA REPRESENTATIVE: Walt Francis

DATE OF INSPECTION: May 20, 2014

SIC CODE: 3714 – Motor Vehicle Parts and Accessories

NAICS CODES: 336399 – All Other Motor Vehicle Parts Manufacturing
336991 – Motorcycle, Bicycle, and Parts Manufacturing
336330 – Motor Vehicle Steering and Suspension
Components (except spring) Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

6/2/2014
Date

ACCEPTED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

6/6/14
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the American Showa, Inc. (American Showa) facility located at 707 West Cherry Street, Sunbury, Ohio to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC), with respect to American Showa's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspectors –
Grant Hewett, Environmental Specialist
Tim Killeen, Environmental Specialist

Representatives of American Showa -
Daisy Childs, Environmental Health and Safety Senior Manager
Rob Cherry, Maintenance/Environmental Senior Manager
Terry Transue, Senior Facility Technician

Site Description/Background Information

The American Showa facility is located at 707 West Cherry Street, Sunbury, Ohio and manufactures suspension and steering components for the transportation industry including automotive, motorcycle and All-Terrain Vehicles. Operations include machining and grinding, welding, cathodic electro-static painting, chrome plating, cleaning, final assembly and testing. The Sunbury, Ohio plant was established in November 1986 under the name Sunbury Component Industries. In April 1994, Sunbury Component Industries, Blanchester FCM and Showa American merged to form American Showa, Inc. American Showa also has plant in Blanchester, Ohio and a Research and Development facility in Corona, California. The Sunbury, Ohio facility generates: wastewater treatment sludge from chrome reduction (F006); out of specification chromium acid solution (D002/D007); PPE contaminated with chromium (D007); waste paint from electrodeposition process (D010); materials contaminated with chromium (D007); paint cans and debris (D001); residue from punctured aerosol cans (D001/D035/D039/D040); used paint markers (D001); and used adhesive containers (D001). On 8/14/2000, American Showa submitted an EPA Notification Form 8700-12 as a Large Quantity Generator (LQG) of hazardous waste. In addition, used oil is generated throughout the plant and collected in 5-gallon, 55-gallon containers and in an outside tank. Also, used coolants are recycled on-site via a centrifuge process by an outside contractor. Used fluorescent lamps are accumulated in an area in the Two Wheel Electric Room. Used batteries are accumulated in containers throughout the plant. American Showa has been at this location since 1988, and

currently has approximately 500 employees, operates three shifts in the 251,101 square foot building located on 39 acres.

At the time of the inspection, the American Showa facility was operating as an LQG of hazardous waste. Historical hazardous waste streams have included off-site shipments of: wastewater treatment sludge from chrome reduction (F006); out of spec chromium acid solution (D002/D007); PPE contaminated with chromium (D007); waste paint from electrodeposition process (D010); materials contaminated with chromium from air scrubber (D007); paint cans and debris material (D001); residue from punctured aerosol cans (D001/D035/D039/D040); used paint markers (D001); and used adhesive containers (D001). Other wastes include: 1) zinc sludge from "E-coating"; 2) Paint Department wastewater treatment sludge; 3) used oil; 4) used fluorescent lamps; 5) used batteries; 6) used rags sent off-site to Cintas for laundering; and 7) used aerosol cans.

Opening Conference

U.S. EPA representative Walt Francis and Ohio EPA representatives Grant Hewett and Tim Killeen arrived at the American Showa facility at approximately 8:30 am. Inspector Francis and Inspectors Hewett and Killeen introduced themselves to Ms. Daisy Childs. Ms. Childs took the inspectors to a nearby conference room. Inspector Francis presented his credentials to Ms. Childs, and informed her of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA and Ohio EPA. Mr. Rob Cherry, Senior Manager Maintenance/Environmental and Mr. Terry Transue, Senior Facility Technician arrived at the conference room. Mr. Cherry provided the inspectors with a brief overview of the facility, and provided information on the various waste streams. Ms. Childs did not make a confidential business information claim on the information gathered during the inspection. Ms. Childs allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in the American Showa Quality Control (QC) Laboratory. Ms. Childs showed the inspectors a 5-gallon container of used oil and a 55-gallon container of used oil. Ms. Childs told the inspectors that used oil and some waste mineral spirits are generated in the QC Laboratory. Any used mineral spirits are placed in the 55-gallon used oil container. The walk-through continued to the Quality Assurance (QA) Testing Laboratory. Ms. Childs told the inspectors that no hazardous waste or used oil is generated in the QA Testing Laboratory. The walk-through continued to the Assembly Line. Inspector Francis observed two unlabeled 5-gallon containers of used oil, see photographs number 1 and 2. The walk-through continued to the "Bulge Line #1". Mr. Cherry showed the inspectors the shock absorber Bulge Line process. Inspector Francis observed an unlabeled 5-gallon used oil container in the Bulge Line area. The walk-through continued to the wastewater treatment plant. Mr. Transue showed the inspectors the wastewater treatment area for non-hazardous waste, and the wastewater treatment area for hazardous waste. Mr. Transue told the inspectors that chrome plating area wastewater is separated from E-coating area wastewater. Mr. Transue showed the inspectors a 1-cubic yard container of F006 electroplating wastewater filter press sludge, see photograph number 4.

Inspector Killeen asked Mr. Transue if the container was labeled. Mr. Transue showed the inspectors a hazardous waste label, but it did not include an accumulation date, see photograph number 3. Mr. Transue showed the inspectors a gaylord box of used electronics and two 10-gallon containers of used paint markers and paint pens, see photograph number 5. Inspector Francis noted that the containers were not labeled. Mr. Transue also showed the inspectors a used aerosol can puncturing device on top of a 55-gallon container. Inspector Francis noted that the container was not labeled and the aerosol can puncturing lid was open, see photograph number 6. The walk-through continued to an area outside of the wastewater treatment plant. Mr. Transue showed the inspectors a 4,000 gallon used oil tank, see photograph number 7. Inspector Killeen asked Mr. Transue about the standing water in the secondary containment area. Mr. Transue told the inspectors that the water is pumped out and discharged to the storm water sewer system if there is no oil contamination per their SPCC plan. Mr. Transue told the inspectors that the other tank contained oil to be used to fill shock absorbers. The walk-through continued to the hazardous waste less than 90-day accumulation area. Mr. Transue showed the inspectors two cubic yard gaylord boxes containing F006 electroplating filter cake sludge, see photographs number 10, 11, 12, 13 and eight 55-gallon containers labeled hazardous waste. Inspector Francis observed a 55-gallon container of chromium debris, D007 dated 5/19/2014, and two 55-gallon containers dated 5/3/2014 and 4/17/2014, see photographs number 9 and 14. In addition, the inspectors observed eight 55-gallon containers of "Chem Fos", see photograph number 8. Mr. Transue told the inspectors that a determination had been made to discard the material. Mr. Transue showed the inspectors the hazardous waste less than 90 day area weekly inspection log. The walk-through continued to the chromium plating line. Mr. Cherry showed the inspectors a 55-gallon SAA container. Inspector Francis observed that the container was open and unlabeled, see photograph number 15. The inspectors also observed another 5-gallon SAA container at the chrome plating line which was used for waste PPE, see photograph number 16. The walk-through continued to the Two-Wheel Electric Room. Mr. Cherry showed the inspectors the universal waste lamp accumulation area, see photograph number 18. Inspector Francis noted that the 4 foot and 8 foot boxes were labeled "Universal Waste" with an accumulation date of 3/16/2014. Inspector Francis also observed that the 8 foot box was open, see photograph number 17. The walk-through continued to the Two Wheel Assembly Area. Mr. Cherry showed the inspectors an SAA container for used "cemedine 575" adhesive tubes, a SAA container for used paint markers, a container for universal waste batteries, and a container of used aerosol cans. The walk-through continued to the Final Assembly Area. The walk-through continued to the Painting Operation. Mr. Cherry introduced Mr. Chuck Caldwell. Mr. Caldwell walked the inspectors through the painting process which includes: a pre-clean; hot potassium hydroxide; rinse; metal preparation; zinc phosphate; overflow; water rinse; cooling tower; E-coating 5,500 gallon tank with black epoxy paint; and a 400 degree baking oven.

The inspection group then returned to the conference room to review records.

Records Review

Ms. Childs and Mr. Cherry provided the inspectors with waste determination records, four years of hazardous waste manifests, recent used oil and universal waste bills of lading, personnel training records, weekly inspection records, and a current version of the contingency plan. The

waste determinations were performed by Ross Incineration Services. Inspector Francis noted that the last out-bound shipment of hazardous waste was on April 14, 2014 to Ross Incineration Services, Inc., Grafton, Ohio (OHD048415665). Used oil was picked up by Valicor Oil Services, Middleton, Ohio (OHR000165845). The last shipment of used lamps were sent to Lighting Resources, LLC, Greenwood, Indiana (IN0000351387) on March 20, 2014. Ms. Childs provided the inspectors with an August 13, 2013 version of the Emergency Action Plan. Mr. Cherry provided the inspectors training records for Mr. Terry Transue and Mr. Tom Stevens which included the years 2011 and 2012 but not 2013. Mr. Cherry told the inspectors that personnel training had not been given to American Showa employees in 2013.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. American Showa would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed used oil labeling, hazardous waste container labeling, electronic waste labeling, used aerosol can container labeling, and weekly inspection logs. Inspector Killeen mentioned the electronic waste labeling. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and an Ohio EPA Pollution Prevention Assistance brochure to Ms. Childs.

Attachments

Inspection Checklists.
Photographs.

**RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST**

Company: American Showa, Inc. EPA ID#: OHD178297297
 Street: 707 W. Cherry Street City: Sunbury
 County: Delaware State: Ohio Zip: 43074
 Mailing Address: Same
 (If different from above)
 Telephone: 740-965-1133 Fax #: _____
 Owner/Operator: Same
 (If different from above)
 Street: _____
 City: _____ State: Ohio Zip: _____
 Inspection Date(s): 5/20/2014 Time(s): _____
 Inspection Announced? Yes X NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Grant Hewett	Ogio EPA	614-728-3878
Facility Representative:	Daisy Childs	American Showa	740-965-7143
	Rob Cherry	American Showa	740-965-7354

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil
	<input checked="" type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
 LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY
NOTE TO THE INSPECTOR**

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]
 [ID number]
 LQG/September 2010
 Page 1 of 6

e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>NOT SITE SPECIFIC</i>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>NO 2013 Training</i>

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 2 of 6

26.	Does the generator keep records and documentation of:		
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
WASTE WATER TREATMENT + SOLID WASTE	TOM STEVENS	12/4/2012
WASTE WATER TREATMENT + HAZ WASTE	TERRY TRAVIS	12/11/2012

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 3 of 6

EMERGENCY PROCEDURES			
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] <i>one side blocked?</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 4 of 6

	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>Food waste</i>
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>Food waste</i>
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>Food waste</i>
	b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>M: 5/12 + 5/16 inspection</i>
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: "Week" means 7 consecutive days per ORC§1.44(A).			
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 5 of 6

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/September 2010

Page 6 of 6

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).</i></p>		
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.</i></p>		
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.</i></p>		
<p><i>NOTE: Written documentation of this determination is not required.</i></p>		
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: If "Yes" see question #16.</i></p>		
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
i.	Applicable HW codes?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
12.	Is the HW treated by burning?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If "No" go to #15.		
13.	Is the HW a metal-bearing HW?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

15.	Was the HW treated by wastewater treatment?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<i>NOTE: If "Yes", HW is improperly being treated by dilution.</i>					
	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].</i>					
<i>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</i>					
GENERATOR TREATMENT					
16.	Does the generator treat to meet LDRs on-site?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.				
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>					
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTIFICATION FORM FOR GENERATOR TREATMENT					
17.	a.	Contains all information in #11 a-g above and	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
	i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]			

{Facility Name/Inspection Date}
 [ID Number]
 Generator LDR/September 2010
 Page 3 of 4

		1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.		Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE PESTICIDES		
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
	a. Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE LAMPS

20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>NOT closed. 2' lamps</i>
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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ACCUMULATION TIME

23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>last shipment - 3/20/14</i>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Accumulation is defined as date generated or date received from another handler.

24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If yes, describe below:		

EMPLOYEE TRAINING

25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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RESPONSE TO RELEASES

26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.

29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		
35.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] <i>Mixture Spill - 0001</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] <u>VALCOR OIL 000165845</u>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>





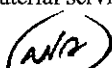
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO
<p>Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):</p> <ol style="list-style-type: none"> 1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since. 2. The container capacity is less than .1 cubic meter (26 gallons) 3. A unit (e.g. tank) has stopped adding waste and is undergoing closure 4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program 5. The unit is used solely to manage radioactive mixed waste 6. The unit is regulated by and operates in accordance with Clean Air Act regulations <p>*Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt</p>				
CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO
<p>General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):</p> <ol style="list-style-type: none"> 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required) 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes. 3. The unit is a tank used for certain biological treatment 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics) 5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements 				
CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed
<p>Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.</p>				

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CONTAINER MANAGEMENT 265.1087						
	Level 1	Level 2	Level 3			
	Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process			
CC-4	265.1087	Controls	NA	NI	OK	DF
<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container <p>265.1087(c)</p>		<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) <p>265.1087(d)</p>	<ul style="list-style-type: none"> -Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: <ol style="list-style-type: none"> 1. container must be vented directly to a control device; or 2. container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed <p>265.1087(b)(2)</p>			

Level 1			Level 2		Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency			NA	NI	OK	DF	
CC -5	265.1087	Waste transfer requirements						
No waste transfer requirements apply 		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)			Not applicable			
CC-6	265.1087	Operating requirements			NA	NI	OK	DF
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)					-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements			NA	NI	OK	DF
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)					Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements			NA	NI	OK	DF
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)					Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements			NA	NI	OK	DF
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service 	Since Level 2 waste is "in light material service", no records need to be kept			Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)				



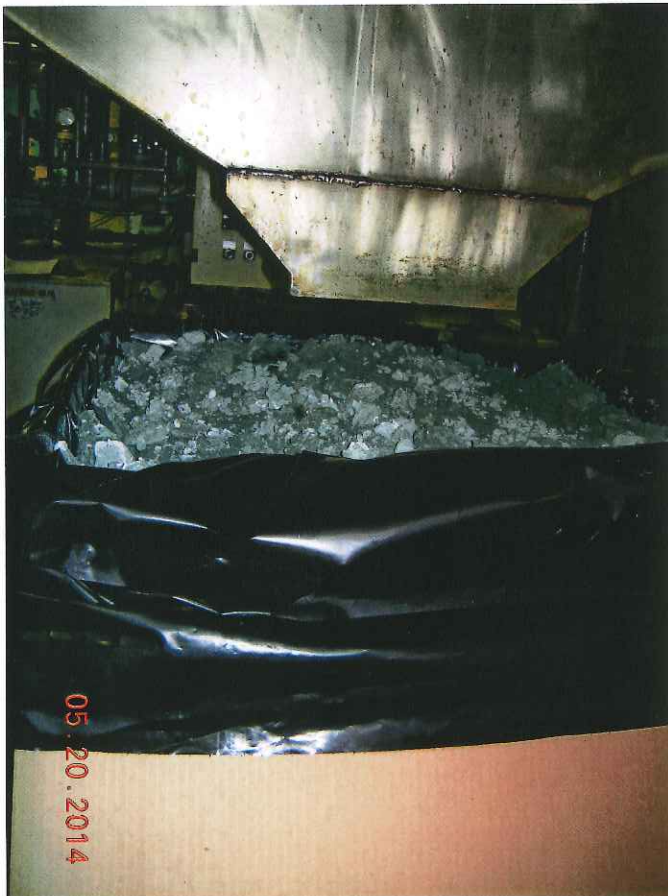
Photograph #1 – Assembly Line, 5-Gallon Container of Used Oil



Photograph #2 – Assembly Line, 5-Gallon Container of Used Oil



Photograph #3 – Wastewater Treatment Area, Container of F006 Electroplating Filter Cake Waste



Photograph #4 – Wastewater Treatment Area, Container of F006 Electroplating Filter Cake Waste



Photograph #5 – Wastewater Treatment Area, 10-Gallon Containers of Used Paint Markers and Used Batteries



Photograph #6 – Wastewater Treatment Area, Aerosol Can Puncturing Device and 55-Gallon Container

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Photograph #7 – Outside Used Oil Accumulation Tank



Photograph #8 – Chemical and Hazardous Waste Accumulation Area, 55-Gallon Containers of ChemFos 700A

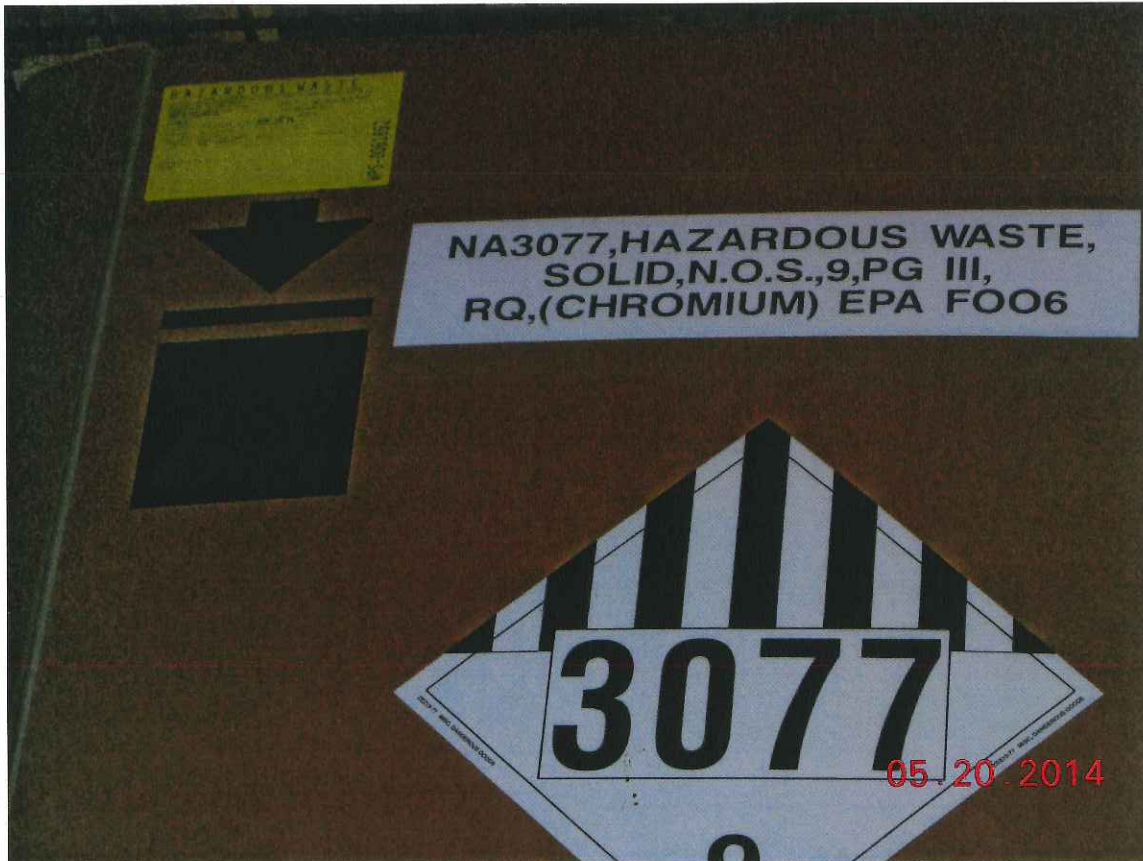


Photograph #9 – Hazardous Waste Accumulation Area, 55-Gallon Containers of Chromium Sludge and Chromium Debris

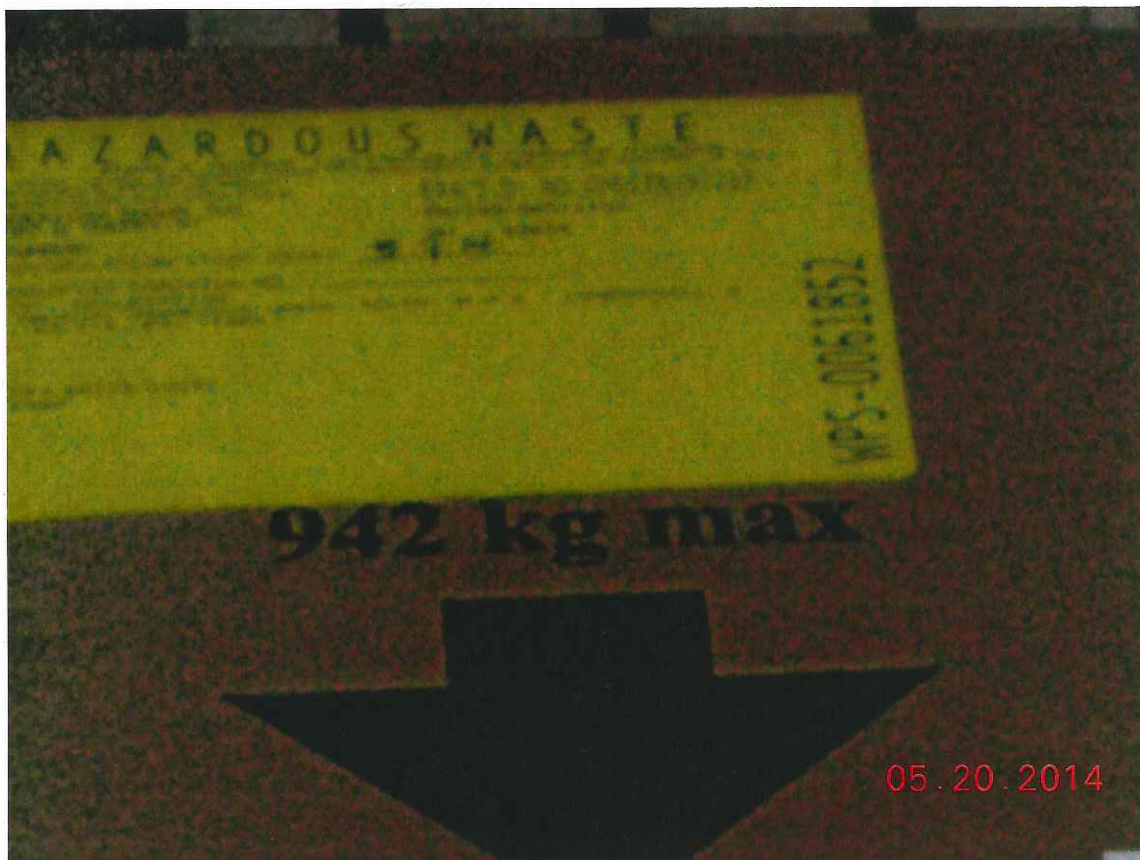


Photograph #10 – Hazardous Waste Accumulation Area, Gaylord Boxes of F006 Hazardous Waste

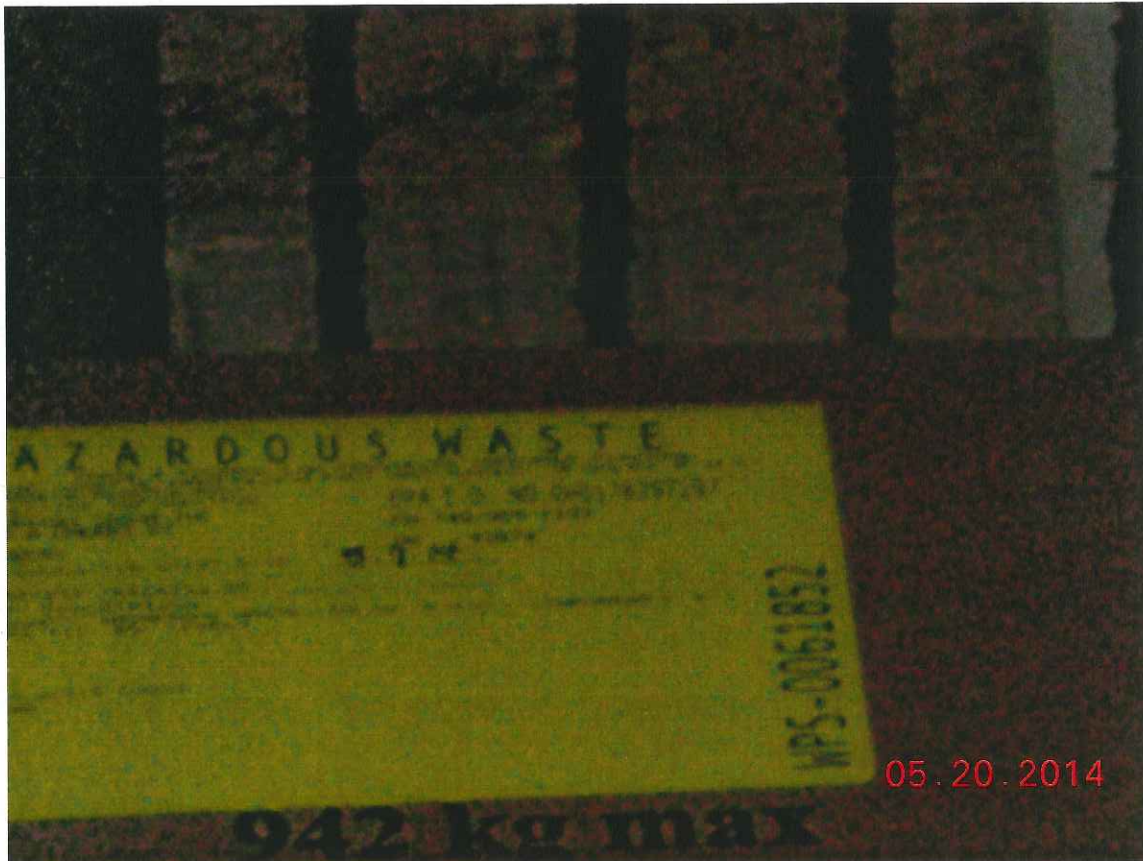
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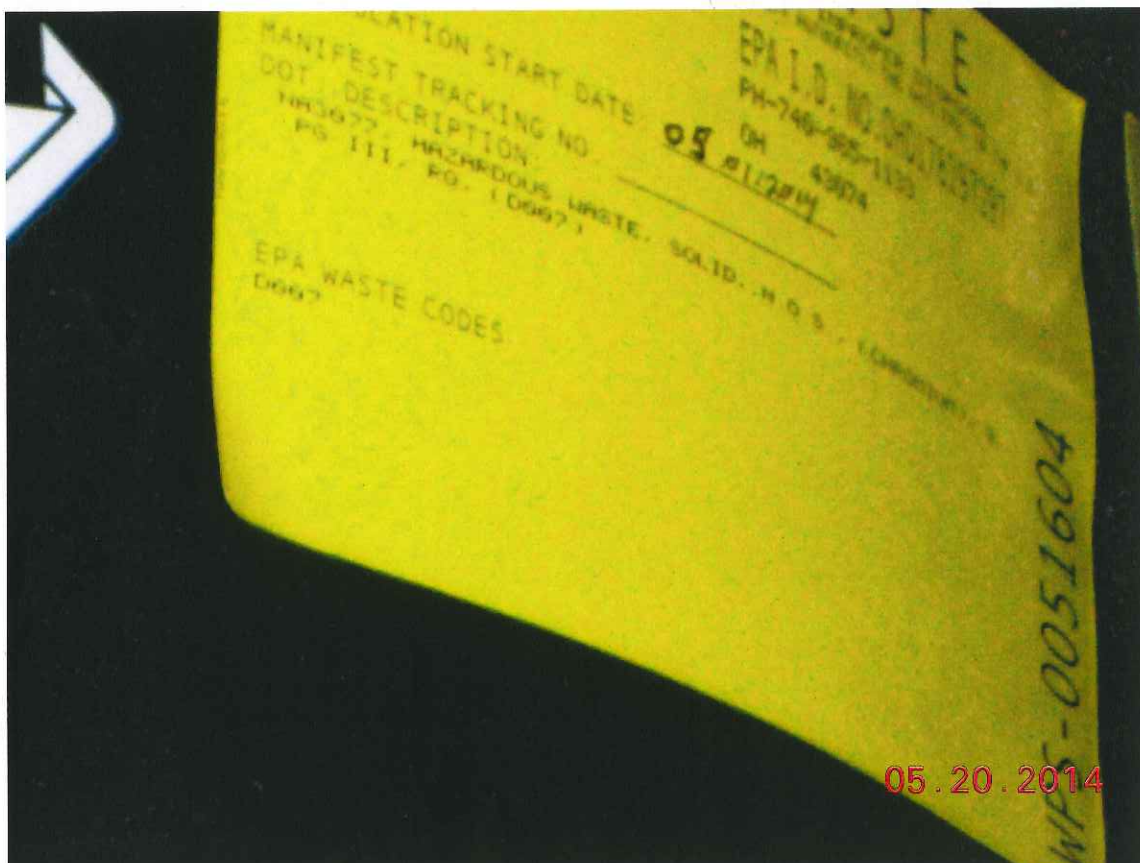
Photograph #11 – Hazardous Waste Accumulation Area, Gaylord Box of F006 Hazardous Waste



Photograph #12 – Hazardous Waste Accumulation Area, Gaylord Box of F006 Hazardous Waste



Photograph #13 – Hazardous Waste Accumulation Area, Gaylord Box of F006 Hazardous Waste



Photograph #14 – Hazardous Waste Accumulation Area, 55-Gallon Container of Chromium Waste

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Photograph #15 – Chromium Plating Line, SAA Container for Chrome Debris



Photograph #16 – Chromium Plating Line, SAA Container for Chrome Debris

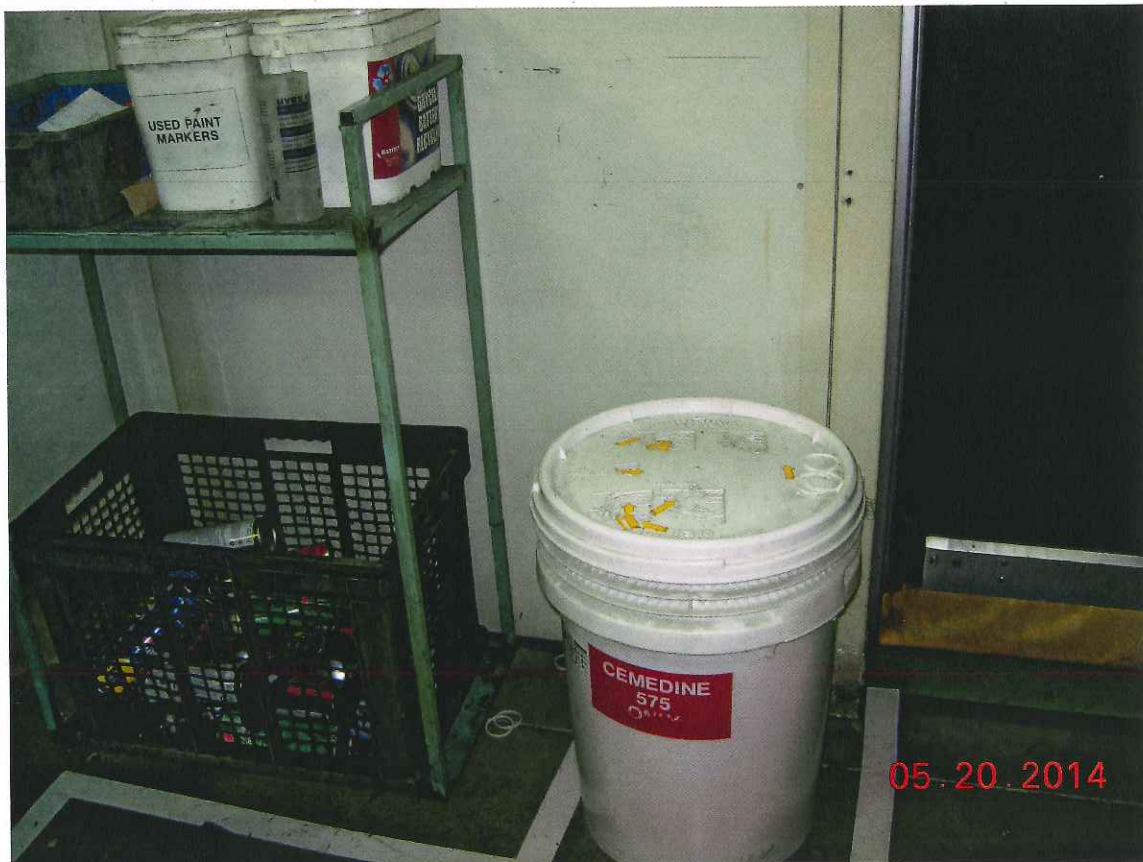


Photograph #17 – Two Wheel Electric Room, Universal Waste Lamp Accumulation Area



Photograph #18 – Two Wheel Electric Room, Universal Waste Lamp Accumulation Area

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Photograph #19 – Two Wheel Assembly Area, SAA Containers of Hazardous Waste, Universal Waste Batteries and Used Aerosol Cans

